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10 Cindy Omidi

11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 United States of America,

15 Plaintiff

16 vs.

17 Cindy Omidi

18 Defendant

19 Case No. CR 13-00739-SVW

20 **JOINT STIPULATION TO RETURN  
21 PASSPORT TO DEFENDANT CINDY  
22 OMIDI**

23 Plaintiff United States of America, by and through its attorneys of record, Assistant  
24 United States Attorneys Kristen Williams, and defendant Cindy Omidi (“Omidi”), by and  
25 through her counsel of record, Ryan D. Kashfian, hereby stipulate as follows:

26 1. As a condition of the appearance bond entered in this case, Mrs. Omidi was  
27 required to surrender any passports she had to the clerk of the court, Dkt. 18, and Mrs.  
28 Omidi surrendered her passport to pre-trial services.

29 2. On August 10, 2015, Mrs. Omidi was sentenced to probation. Dkts. 442, 443.

30 3. In addition, on December 1, 2015, the court issued an order granting a money  
31 judgment forfeiture, Dkt. 467, and on February 3, 2016, Mrs. Omidi satisfied the money  
32 judgment, Dkt. 474.

33 4. On February 7, 2017, the court issued a report and order terminating  
34 probation prior to original expiration date. Dkt. 496. The report found that Mrs. Omidi  
35 had completed all of the requirements involving her sentencing and that she had met all of

1 the special conditions for probation as ordered by this court and stated that she was  
2 "discharged from supervision and the proceedings in the case be terminated." *Id.*

3 5. On March 19, 2017, pre-trial services indicated that it will release the  
4 passport to Mrs. Omidi upon the court issuing an order approving pre-trial services to  
5 return the passport. Pre-trial services stated that Mrs. Omidi is a US Citizen and that,  
6 unless the Court provides an order to return the passport to Mrs. Omidi, pre-trial services  
7 in due course will forward the passport to the State Department. Pre-trial services has no  
8 objection to returning the passport to Mrs. Omidi.

9 6. Accordingly, counsel respectfully request that the Court enter an order  
10 having pre-trial services return the passport to Mrs. Omidi.

11 IT IS SO STIPULATED.

12 13 DATED: March 13, 2017

KASHFIAN & KASHFIAN, LLP

14 15 16 By: /s/ Ryan D. Kashfian  
17 Ryan D. Kashfian  
18 Counsel for Defendant  
Cindy Omidi

19 20 21 DATED: March 13, 2017

KRISTEN WILLIAMS  
22 Assistant United States Attorney

23 24 25 26 27 28 By: /s/Kristen Williams  
Kristen Williams  
Counsel for Plaintiff  
United States of America